

1 Marc Steven Colen, sbn 108275
2 The Colen Law Firm
3 2828 Cochran Street, #490
4 Simi Valley, CA 93065
Tele: 818.716.2891

5 Attorney for Defendants,
6 Todd Sankey and The Sankey Firm, Inc.

7
8 **UNITED STATES DISTRICT COURT**
9 **CENTRAL DISTRICT OF CALIFORNIA**
10 **SOUTHERN DIVISION**

11
12
13 Lisa Liberi, et al.,

14
15 Plaintiffs,

16 vs.

17 Orly Taitz, et al.,

18 Defendants

) **Case No.: 8:11-cv-00485 AG**
) **(AJWx)**
)
) **OBJECTIONS TO THE**
) **DECLARATION OF RYAN**
) **RUSTIG CONCERNING**
) **ANOTHER PENNSYLVANIA**
) **ACTION BY THE PLAINTIFFS**
)
)
)
) Before Hon. Andrew J. Guilford,
) Judge, United States District Court

21
22
23 Date: 3 February 2014

24 Time: 10:00 am

25 Courtroom: 10D
26
27
28

1 **OBJECTION TO THE ENTIRE DECLARATION OF RYAN LUSTIG:**

2

3 Irrelevant. This document has nothing to do with this case; it concerns

4 subpoenas another case by the Plaintiffs, Ostella, et al *vs. IRB et al.* 2:12-cv-

5 07002-TON. It merely demonstrates that the Plaintiffs are trying to obtain

6 discovery from Todd Sankey, The Sankey Firm, Inc., and Neil Sankey despite

7 that the discovery cutoff in this matter passed long ago. Further with regard

8 to that Pennsylvania action, Todd Sankey, The Sankey Firm, Inc. and Neil

9 Sankey filed a motion to dismiss for lack of jurisdiction which was granted

10 and the case was dismissed as to them. [Further, the declarant's testimony in

11 paragraph 6 is false but is not disputed herein because it is not at issue to or

12 relevant to this case.]

13

14 **OBJECTION TO INDIVIDUAL PARAGRAPHS:**

15

16 Objection to Paragraph 1.

17 Irrelevant.

18

19 Objection to Paragraph 2.

20 Irrelevant.

21 States declarant's legal opinion regarding "independent contractor" status

22 with no foundation nor basis.

23

24 Objection to Paragraph 3.

25 Irrelevant.

26

27 Objection to Paragraph 4.

28 Irrelevant.

1 States declarant's legal opinion regarding "proper service" with no foundation
2 nor basis.

3
4 Objection to Paragraph 5.

5 Irrelevant.

6 States declarant's legal opinions with no foundation nor basis.

7
8 Objection to Paragraph 6.

9 Irrelevant.

10 States declarant's opinion, including legal opinions concerning "willingly
11 accepted" and "on behalf of The Sankey Firm, Inc.", all with neither
12 foundation nor basis.

13
14 Respectfully submitted on this 25th day of January 2014,

15
16 ***/s/ Marc Steven Colen***

17 The Colen Law Firm
18 Attorney for Defendants,
19 Todd Sankey and The Sankey Firm, Inc.